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**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
NORTHERN DIVISION**

In re

HVI CAT CANYON, INC.,

Debtor.

Case No.: 9:19-bk-11573-MB

Chapter 7

**GIT, INC.'S UNILATERAL STATUS
REPORT RE MOTION FOR PROTECTIVE
ORDER**

Hearing:

Date: June 15, 2020

Time: 10:30 a.m.

Place: Courtroom 201

1415 State Street

Santa Barbara, CA 93101

**TO THE HONORABLE MARTIN R. BARASH, UNITED STATES BANKRUPTCY
JUDGE:**

Creditor, GIT, Inc. ("GIT"), respectfully submits the following with respect to the
Rule 2004 subpoena served on GIT.

As reflected in the Trustee's Status Report re Motion for Protective Order (Dkt.
No. 1075), Margulies Faith, LLP ("MF") substituted into this case as counsel of record for
movant GIT, Inc. on June 1, 2020 (Dkt. No. 1040). MF has spent the last two weeks
getting up to speed on the case by reviewing relevant pleadings, transcripts, and
documents.

1 With respect to the pending Motion for Protective Order (Dkt. No. 909), MF is
2 working to determine where the parties have reached consensus and where disputes
3 remain. These efforts have included discussions with the Trustee's counsel, the client,
4 former counsel, and IT professionals. As of the submission of this report, these efforts
5 remain ongoing.

6 MF and GIT are sensitive to the fact that this matter has been pending for a
7 prolonged period and needs resolution. However, MF believes that within the next one to
8 two weeks a negotiated resolution of the Motion can be achieved without the need for
9 court intervention. Alternatively, the parties should be able to narrow down any disputed
10 issues.

11 Accordingly, GIT requests a short two week continuance of the hearing on the
12 Motion for Protective Order to allow new counsel the opportunity to resolve all, or most,
13 of the pending discovery issues.

14
15 Dated: June 12, 2020

MARGULIES FAITH, LLP

16 /s/ Jeremy W. Faith
17 Jeremy W. Faith
18 Attorneys for Creditor, GIT, Inc.
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
16030 Ventura Blvd., Suite 470, Encino, CA 91436

A true and correct copy of the foregoing document entitled **GIT, INC.'S UNILATERAL STATUS REPORT RE MOTION FOR PROTECTIVE ORDER** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On June 12, 2020, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On June 12, 2020, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

JUDGE: Pursuant to Amended General Order 20-02, judge's copies are not required for any document less than 25 pages.

DEBTOR: HVI Cat Canyon, c/o Capital Corporate Services, Inc., 36 S. 18th Ave., Suite D, Brighton, CO 80601

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

May 1, 2020
Date

Angela Saba
Printed Name

/s/ Angela Saba
Signature

ADDITIONAL SERVICE INFORMATION (if needed):

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